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December 4, 2025

VIA ECF

Judge Joseph A. Marutollo, U.S.M.J.
United States District Court,
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Laduca et al v. Bari Home Care, LLC et al*, Docket No. 24-cv-07970 (LDH)(JAM)

Dear Judge Marutollo,

This firm is counsel to Plaintiffs in the above-referenced action. Together with defense counsel, we submit this joint status report pursuant to this Court's November 3, 2025 Order.

The parties have been engaged in pre-class certification discovery in accordance with the November 3, 2025 Order. On August 18, 2025, Plaintiffs served Defendants with Plaintiffs' Amended Interrogatory Demands and Requests for Production ("Plaintiffs' Demands"). Defendants just recently produced their responses to Plaintiffs' Demands on November 28, 2025. After reviewing Defendants' responses, Plaintiffs informed Defendants that Plaintiffs believe the responses are deficient because they only contain information and documents pertaining to the Named Plaintiffs, and not any opt-in Plaintiffs or putative class members. On December 3, 2025, the Parties engaged in a good faith meet and confer in an attempt to resolve such disputes. The Parties intend to meet and confer again during the week of December 8, 2025 in a continuation of their efforts to resolve such disputes prior to any Court intervention. In the event that the Parties are unable to resolve the discovery disputes on their own, they will write to the Court pursuant to this Court's Individual Rule (VI)(B).

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Paige I. Piazza, Esq.

Cc: All counsel of record (via ECF)